

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

MICHAL NAWROT,)
Plaintiff,)
)
v.) No. 08 C 462
) Judge St. Eve
COUNTY OF COOK, ILLINOIS, a) Mag. Judge Keys
municipal corporation, THOMAS)
DART, SHERIFF OF COOK COUNTY,)
in his official capacity, and)
COOK COUNTY SHERIFF'S DEPARTMENT,)
a municipal corporation.)
Defendants.)

JOINT INITIAL STATUS REPORT

1. The Nature of the Case

A. Identify the attorneys of record for each party, including the lead trial attorney.

Plaintiff's Attorney: **James Rowe**
The Law Firm of Rowe & Associates
205 W. Randolph, Suite 1430
Chicago, Illinois 60606

Defendants' Attorney: **Office of the States Attorney**
Jamie Sheehan
Torts & Civil Rights Litigation Section
500 Richard J. Daley Center
Chicago, Illinois 60602

B. State the basis for federal jurisdiction.

42 U.S.C. §1983 and 8 CFR 287.7(d)

C. Describe the nature of the claims asserted in the complaint and any counterclaims.

Plaintiff makes a claim against Defendants for False Imprisonment, Intentional & Negligent Infliction of Emotional Distress, Denial of Equal Protection and Due Process.

D. State the major legal and factual issues in the case.

Plaintiff alleges that Defendants continued to detain Plaintiff at the Cook County Jail for a period of time in excess of 48 hours beyond the time he posted bond, in violation of 8 CFR 27.7(d).

E. Describe the relief sought by the plaintiff(s).

Actual, Compensatory, & Punitive Damages

2. Pending Motions and Case Plan

A. Identify All Pending Motions

None at this time.

B. Submit a proposal for a discovery plan, including the following information:

(A). The type of discovery needed;

Written discovery (Interrogatories, Requests to Produce, and/or Requests to Admit) and Depositions.

(B). A date for Rule 26(a)(1) disclosures;

March 31, 2008

(C). A fact discovery completion date;

June 30, 2008

(D). An expert discovery completion date, including dates for the delivery of expert reports;

July 31, 2008

(E). A date for the filing of dispositive motions; and

August 15, 2008

(F). A date for the filing of a final pretrial order.

September 15, 2008

C. With respect to trial, indicate the following:

A. Whether a jury trial is requested;

Plaintiff has made a demand for trial by jury.

B. The probable length of trial; and

Approximately 3 days.

C. When the case will be ready for trial.

October 20, 2008

3. Consent to Proceed Before a Magistrate Judge

The parties do not unanimously consent to proceed before a Magistrate Judge.

4. Status of Settlement Discussions

A. Indicate whether any settlement discussions have occurred;

Defendant tendered an offer pursuant to Rule 68; Plaintiff rejected.

B. Describe the status of any settlement discussions; and

Ongoing.

C. Whether the parties request a settlement conference.

The parties request a settlement conference.

Respectfully submitted,

MARCH 12, 2008

/s/ James R. Rowe

Counsel for Plaintiff

James R. Rowe

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205 West Randolph, Suite 1430
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/s/ Jamie Sheehan

Counsel for Defendants

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